Reply to Office action of February 12, 2004

#### **REMARKS/ARGUMENTS**

Claims 1-29 remain in the application.

### A. Amendment to the Specification.

The specification is amended to clarify the term "transmittal form" that is used in claims 10-15 as filed. This amendment is intended to clarify the claim language and not to alter the scope of the claimed subject matter. No new matter is added by this amendment.

## B. Rejections under 35 U.S.C. 102.

Claims 1, 2, 4-8, 10, 11, 13-17, 19 and 20 were rejected under 35 U.S.C. 102 based upon the Houlihan et al. reference. This rejection is respectfully traversed.

Independent claim 1 calls for, among other things, a network training laboratory and a training host that, among other things, generates and transmits a user interface comprising a graphical representation of the computer networking devices in the network training laboratory. At least these elements of claim 1 are not shown or suggested in the Houlihan et al. reference.

Houlihan teaches a generic interactive training system for delivering training materials over a network. Houlihan does not contemplate network training in particular, and does not show or suggest a network training laboratory called for in claim 1. The Office action appears to point to the description of Fig. 1 as showing a network training laboratory. However, as noted in applicant's specification, a network training laboratory is a specialized set of equipment that allows students and instructors to connect to a group of IT network components that make up a networking laboratory. The laboratory is not implemented to serve as a conduit for student-teacher interactions, but is a set of devices that can be manipulated and programmed by students and teachers so that the students can be instructed as to how the devices work.

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For example, if the networking laboratory is modeling a remote access network, the IT network components may include a number of routers, a Web access server, an authentication, authorization, and accounting (AAA) server, a file server, a firewall or other security device, and components that model telecommuter and branch office access via a public service telephone network (e.g., PCs and modems connected via a telephone switch to a channel bank or similar device and servers connected via a network such as a frame relay cloud). During the course, students gain hands-on experience by configuring and manipulating the functional IT equipment located in the adjacent networking laboratory, typically by entering command lines through their PCs. The hands-on experience is limited to a fixed number of hours allotted for the students to use the networking laboratory.

Hence, Houlihan et al. do not show or suggest this very specialized component called for in claim 1. Even if one were motivated to adapt Houlihan et al. in some way so as to provide network training, there is not teaching or suggestion as to how such adaptation would be accomplished. Claims 2 and 4-8 that depend from claim 1 are believed to be allowable for at least the same reasons as claim 1.

Independent claim 10 calls for, among other things, a method including positioning the network training laboratory at a laboratory site and generating a transmittal form comprising identifying information for each of computer networking devices in the network training laboratory. At least these elements of claim 10 are not shown or suggested in the Houlihan et al. reference. As set out above, Houlihan et al. do not show or suggest a network training laboratory or a method for providing network training (e.g., training about how to configure and operate a network) to students. For at least the same reasons as set out above in regard to claim 1, claims 10 and claims 11, 13, 14 and 15 that depend from claim 10 are believed to be allowable over Houlihan et al.

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Independent claim 16 calls for, among other things, providing a host computer system having a router controller and a server controller that are linked to control routers and servers within a communication network. As called for in claim 16, a remote node is used to select an operating state for linked routers and linked servers by communicating with the router controller and server controller, respectively. It should be noted that claim 16 is not limited to the field of network training as are claims 1 and 10, for example. At least these features of claim 16 are not shown or suggested in the relied on reference.

In the case of claim 16, the Office action fails to state a prima facie case of anticipation. The only reason stated is that claim 16 is rejected for the same reasons as claim 1. However, the rejection of claim 1 does not discuss the steps of operating a remote node to select an operating state for linked routers, or operating a remote node to select an operating state for linked servers. The rejection of claim 1 does not state where in Houlihan one can find a host computer system linked to a communications network, the host computer system including a router controller and a server controller. Accordingly, it is respectfully requested that the rejection of claim 16 and claims 17 and 19 that depend from claim 16 be withdrawn.

Independent claim 20 calls for, among other things, providing a network training laboratory and operating an administrator mechanism to deliver a student interface to the student node, wherein the student node is configured to provide access over the direct communications path to a course subset of the network devices of the laboratory. At least these features of claim 20 is not shown or suggested in Houlihan et al. As set out above with respect to claims 1 and 10, Houlihan does not show a method in which a student node is given access to network devices in a laboratory, nor to a subset of those devices. Nothing in Houlihan et al. suggests a modification that would allow such access. For at leas these reasons claim 20 is believed to be allowable over the relied on reference.

# C. Rejections under 35 U.S.C. 103.

Claims 3, 9, 12, 18, 21, 22-28 were rejected under 35 U.S.C. 103 based upon Houlihan et al. in view of DeNicola et al. Claims 3 and 9 depend from claim 1 and are distinct from Houlihan et al. for at least the same reasons as claim 1. DeNicola et al. do not supply the deficiencies of Houlihan noted above. Claim 12 depends from claim 10 and is distinct from Houlihan et al. for at least the same reasons as claim 10.

Claim 18 depends from claim 16 and is allowable over Houlihan for at least the same reasons as claim 16. DeNicola et al. do not supply the deficiencies of Houlihan et al. Specifically, DiNicola et al. do not show or suggest any reason to operating a remote node to select an operating state for linked routers, or operating a remote node to select an operating state for linked servers.

Claims 21-25 depend from claim 20 and are believed to be allowable for at least the same reasons as claim 20. DeNicola et al. do not supply the deficiencies of Houlihan et al.

Independent claim 26 calls for, among other things, communicatively linking a training host to a network training laboratory. Claim 26 further calls for generating a plurality of user interfaces providing a plurality of differing levels of administrative and communication access to the training host and to the network devices of the laboratory. As noted above, Houlihan et al. do not show or suggest a network training laboratory. Moreover, the Office Action fails to even allege that Houlihan or DeNicola show or suggest a method for administering configuration of and access to a network training laboratory (or any other type of network). Hence, the Office Action fails to state a prima facie case of obviousness. For at least these reasons claim 26 and claims 27-29 that depend from claim 26 are believed to be allowable over the relied on references.

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# D. Conclusion.

In view of all of the above, claims 1-29 are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.

No fee is believed to be required by this response. Any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

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